

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**PORTUS SINGAPORE PTE LTD AND  
PORTUS PTY LTD.**

Plaintiffs,

v.

**VIVINT, INC.,**

Defendant.

**Civil Action No. 3:19-cv-310-K**

**JURY TRIAL DEMANDED**

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION TO  
DISMISS PLAINTIFFS' AMENDED COMPLAINT WITH PREJUDICE**

Plaintiffs Portus Singapore Pte Ltd. and Portus Pty Ltd. (collectively, "Plaintiffs") submit this Response in Opposition to Defendant Vivint, Inc.'s ("Defendant") Motion to Dismiss Plaintiffs' Amended Complaint with Prejudice ("Motion") and Brief in Support (Dkt. Nos. 23 & 24) filed on June 12, 2019. Plaintiffs respectfully request that this Court deny Defendant's Motion for the reasons set forth in the accompanying Answering Brief in Support, filed concurrently with this response pursuant to Local Rule 7.1(d).

DATED July 3, 2019.

Respectfully submitted,

By: /s/ Stevenson Moore  
Timothy T. Wang  
Texas Bar No. 24067927  
twang@nilawfirm.com  
Stevenson Moore V  
Texas Bar No. 24076572  
smoore@nilawfirm.com

**NI, WANG & MASSAND, PLLC**  
8140 Walnut Hill Ln., Ste. 500  
Dallas, TX 75231  
Tel: (972) 331-4600  
Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFFS  
PORTUS SINGAPORE PTE LTD. AND  
PORTUS PTY LTD.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of July, 2019, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, Dallas Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Stevenson Moore  
Stevenson Moore